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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA,
SOUTHERN DIVISION**

LISA LIBERI, et al

Plaintiffs,

vs.

ORLY TAITZ, et al,

Defendants.

CIVIL ACTION NUMBER:

8:11-cv-00485-AG (AJW)

**DECLARATION OF LISA
OSTELLA**

Date of Hearing: October 17, 2011

Time of Hearing: 10:00 a.m.

Location: Courtroom 10D

Declaration of Lisa Ostella

I, Lisa Ostella am over the age of 18 and am a party to the within action. I have personal knowledge of the facts herein, and if called to do, I could and would competently testify. I am making this Declaration under the penalty of perjury of the Laws of the United States pursuant to 28 U.S.C. §1746.

1. I did work with Orly Taitz, herein referred to as Taitz. For a short time I was a volunteer web master and assistant for defendant Taitz. But, other than

1 work concerning this lawsuit, *Liberi, et al v. Taitz et al*, I do not assist the Law
2 Offices of Philip J. Berg, or affiliated entities, as stated by Taitz, page 5, lines 26-8,
3
4 MTD by LOOT.

5 2. In Taitz's Motion To Dismiss on behalf of the Law Offices of Orly
6 Taitz, herein referred to LOOT, Page 2, line 10 and on Page 5, line 27-28: Taitz
7
8 incorrectly rewrites this case with:

9 "...who blew the whistle on Berg, Liberi and Ostella, plaintiffs herein,
10 there was a prior dismissal in this case without prejudice and with a
11 certain stipulation and prior stipulation agreement was breached"
12 and
13

14 "...web master Lisa Ostella, who for a short time was a volunteer web
15 master for defendant Orly Taitz, but who is currently assisting Berg,
16 as well as their affiliated entities."
17

18 There was no whistle to blow on me. I told Taitz she had to find another web host
19 after she posted on the defendourfreedoms.us blog and sent out Dossier #5:
20 "Dossier #5, additional cybercrimes, demand for immediate investigation and
21 prosecution", April 8, 2009. As her webhost and webmaster, I refused to
22 corroborate the hacking and cyber-crimes she was falsely claiming in that report. I
23 did not know the staff of the Law Offices of Philip J. Berg nor did I ever have
24 conversations with Philip J. Berg prior to this case, *Liberi, et al v. Taitz, et al*,
25 which was filed in May 2009.
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1 3. I did assist Mr. Berg in transitioning his website as well as updating it
2 for the Law Offices of Philip J. Berg back in June and July 2009 when his site was
3 taken over by a hacker. But I am not Berg's webmaster. His webmaster is a
4 witness in this case and was present in court August 2009 at a hearing for this case.
5

6 4. LOOT states on Page 6-7 line 15-28 and line 1:
7

8 "In November of 2008 Lisa Ostella approached Taitz and offered her
9 to create a blog (web site) for Taitz foundation DOFF. In March of
10 2009 donors reported to Taitz problems with Pay-pal donations. Taitz
11 had other concerns in regards to Ostella using the web site of
12 foundation for sales of T-shirts and other financial endeavors, where
13 Ostella did not provide Taitz, president of DOFF, with any accounting
14 or revenues for DOFF. Taitz advised Ostella, that she will be
15 transferring to another web master. Instead of providing a smooth
16 transfer Ostella locked Taitz out of the old web site for the foundation
17 and used the web site as well as list of donors to continuously seek
18 donations, which went to Ostella, not DOFF, Ostella also used the old
19 website to denigrate Taitz and promote competing attorney Berg.
20 Taitz was forced to create a new web site and lost significant amount
21 of donations due to actions of Ostella. Taitz wrote to attorney Berg
22 and asked him to cease and desist providing patronage to Ostella, who
23 was diverting funds from Taitz and DOFF."
24

25 and

26 "Taitz advised Ostella, that she will be transferring to another web master."
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1 This contradicts Taitz prior claims, as explained below. Taitz did not decide to
2 transfer out of concerns of 'financial endeavors'. I told her to leave my services
3 due to lies and rumors of cyber-crimes Taitz was posting and reporting.
4

5 5. I did not approach Taitz. Taitz received my name from Markham
6 Robinson. Taitz started calling me and leaving voicemail messages in the fall of
7 2008. When I did return Taitz's call, Taitz requested my assistance in fighting
8 voter fraud. I was working on issues concerning The Help America Vote Act
9 (HAVA) with other organizations and agreed to become her assistant webmaster at
10 drorly.blogspot.com, this site is still published on the web. The head webmaster,
11 Bob Stevens (I don't know his real name; but that is one of the names he went by),
12 installed a 3rd party software, JSKit, on drorly.blogspot.com at Taitz's consent.
13 That software created so many issues with the site; that people really could not use
14 her site. I bought the domains: defendourfreedoms.us, defendourfreedoms.com,
15 defendourfreedoms.org and defendourfreedoms.net. I started building a new
16 website and blog.
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22 6. Neither Taitz nor Defend our Freedoms Foundations, Inc. ("DOFF")
23 bought the domains or hosting services. Neither Taitz nor DOFF offered or paid
24 any money for the domains. See my declaration filed August 27, 2009; Docket
25 No. 107-1, which also have my receipts from my domain names.
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1 7. I brought Taitz over to defendourfreedoms.us to use that blog when
2 drorly.blogspot.com started redirecting to pornographic websites.

3
4 8. Taitz had to be locked out of the defendourfreedoms.us site in April
5 2009 because she was publishing lies about the 'Obama Regime' hacking the site I
6 was responsible for and falsely accusing the 'Obama Regime' of stealing her
7 donations. See Dossier #5 attached as **EXHIBIT “1”**.

8
9 9. I told Taitz to correct this report or find another web host and I was
10 willing to transfer my domains to her. Taitz could have even gone back to her
11 original site, drorly.blogspot.com. It is still published. It works fine without the
12 JSKit software plugin.

13
14
15 10. Taitz went on an East Coast AM radio show and told the public that I
16 stole money and hacked and hijacked the site, defendourfreedoms.us. The lies
17 continued from there and escalated. Due to Taitz’s false allegations and stories, I
18 could not give her my domain names as I had to keep them in tact for this
19 litigation. This is explained in our Amended Complaint at pages 19-21, paragraphs
20 51-56. See also my declaration filed August 27, 2009, Docket No. 107-1.

21
22
23 11. Taitz is again falsely accusing me of selling T-shirts. Taitz raised
24 the issue about these T-Shirts previously in a declaration in support of her
25 AntiSLAPP Motion, filed May 27, 2011, docket #207. The T-Shirts were never
26 handled or sold on my defendourfreedoms sites nor were they ever under my
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28

1 control. Evidence of which was filed May 31, 2011, see docket #212, Pages 4-6,
2 paragraphs "i" and "p" and pages 6-9; See also my previous declaration filed May
3 31, 2011, docket #213. The T-Shirts were handled by other assistants of Taitz on
4 other social networking and blog sites that I never visited nor had any type of login
5 for, see the website print-out showing that Lyn Shaw was one of the assistants
6 handling the T-shirt sales on behalf of defendant Taitz filed in our (Appellees)
7 Supplemental Appendice at pages J260-J262 and J277 filed November 7, 2010 in
8 *Liberi et al v Taitz et al*, 3rd Circuit Court of Appeals Case #10-3000. I had
9 nothing to do with the T-Shirts.

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13 12. Taitz submitted to the U.S. District Court, Southern District of Florida
14 in the case of *Rivernider v. U.S. Bank*, Case No. 9:09-cv-81255-WPD, forged cut
15 and pasted versions of what she perpetuated the defendourfreedoms.us blogsite to
16 be to substantiate her false allegations against me that I was using her site to collect
17 monies, see Taitz filing in the *Rivernider* Case on January 21, 2010, Docket No. 50
18 attached hereto as **EXHIBIT "2"**. None of these paper machete forged
19 representations of the defendourfreedoms.us blog even had information on them
20 about these T-Shirts, See my declaration in the *Rivernider* Case filed on January
21 26, 2010 as Docket No. 55-1, attached hereto as **EXHIBIT "3"**.

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26 13. There was a link to jewelry sales on DefendOurFreedoms.us, that
27 Taitz had me add to the blog site. The jewelry sales were set-up by another
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1 moderator, Susan Hiller. I did not have anything to do with the sale of any
2 jewelry. Susan Hiller was an assistant moderator for DefendOurFreedoms.us that
3 Taitz brought in to help filter comments on the blog. During this time, Taitz had
4 me working with the paralegal on the Military Lawsuit Taitz was filing against
5 President Obama. Susan Hiller's business, Long Stem Gems, was promoted by
6 Taitz personally. See **EXHIBIT "4"** attached hereto which is about Long Stem
7 Gems.
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11 14. Other 'financial endeavors' undertaken by Taitz was a Texas
12 conference that never took place. One of Taitz's assistant's, Lyn Shaw, was
13 collecting monies and credit card information from supporters to attend a
14 conference Taitz organized. I do not believe that conference took place. The
15 documents concerning that event were filed in my Affidavit in this case on
16 September 14, 2010, see Docket No. 144-9 and also in the *third Circuit Court of*
17 *Appeals in Liberi, et al v. Taitz, et al*, Case No. 10-3000 on November 7, 2010,
18 document number 003110340436 in Plaintiffs (Appellees) Supplemental
19 Appendices at pages J224-J281.
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23 15. Once I set-up Taitz's PayPal, Taitz changed the password and locked
24 me out, which is normal protocol. I had no reason to remain with access to it.
25 However, Taitz never removed my email, contact name and phone number from
26 the account records after login rights were removed. Therefore, I continued to
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1 receive activity alerts from the DOFF PayPal. Activity alerts include payment
2 requests, like Ruben Nieto's money requests which have been filed in this case
3 several times, see Exhibits "132" and "133" filed May 20, 2011, Docket No. 190-
4 24. To date, every PayPal receipt Taitz has produced to prove she was missing
5 donations has been located in the PayPal records subpoenaed in this case and
6 proven by Taitz's PayPal records filed in this case May 20, 2011, see Exhibits "22"
7 and "23", Docket No. 190-5. Taitz never made a report with PayPal about missing
8 or redirected funds.
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12 16. My PayPal button and/or account was never on Taitz's active blog,
13 defendourfreedoms.us. My PayPal button went up on defendourfreedoms.net
14 which was never used by Taitz for any of her activities. I received one donation of
15 \$100 in support of our case, *Liberi, et al v. Taitz, et al*, after it was filed and
16 became discussed on numerous websites. This receipt, as well as my PayPal
17 records and my bank account records were filed in this case in the December 2010
18 Temporary Restraining Order ("TRO") hearing. Those records still have not been
19 uploaded to the docket from Judge Robreno's court and can only assume they were
20 placed under seal. I am willing to re-file them if your Honor feels it is necessary.
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25 17. Taitz made a false report to the Orange County Sheriff's Department
26 and other law enforcement authorities falsely stating that Lisa Liberi and I were the
27 same person and I stole \$10,000 from her (Taitz). Taitz also spread this false
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1 rumor to every person she could find associated with me as well as every customer
2 of Go Excel Global (“GEG”), my business. Taitz told these same people I had a
3 felony record and used various versions of the “internet rap” sheet she has
4 circulated. Taitz has continued to vary these stories and has not stopped promoting
5 these false stories for 3 years.
6
7

8 18. Taitz published my address, phone number and names of my family
9 to ensure her incited followers would take actions, which they have. Taitz has
10 posted on her site, stated during interviews and made sworn submissions to this
11 court as well as other courts that she received my contact information and Lisa
12 Liberi’s private data from LexisNexis, Choicepoint and Intelius. Taitz reported to
13 Orange County Sheriff’s department that she hired The Sankey Firm, Neil Sankey
14 to run background checks on us, see the Orange County Sheriff’s Department
15 Report filed by Orly Taitz in April 2009, filed as Exhibit 16 on May 20, 2011,
16 Docket No. 190-4. Sankey did interviews stating he used LexisNexis and Intelius
17 to run these checks.
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22 19. Taitz used the creditability of these database providers, Sankey’s C.V.,
23 her status as an Officer of the Court and a doctor, as well as the credentials of her
24 chosen 3rd party associates that my alleged criminal history was substantiated by
25 these individuals and database companies with “status”. The credibility status of
26 these authorities were also used in reporting to entities like the FBI, North
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28

1 Brunswick Police, NJ Consumer Affairs, all members of organizations I was
2 associated with. Customers of GEG, including my auction board, Breederville,
3 neighbors, Senate Judiciary Committee, UN entities, etc. Because of this, I lost all
4 my clienteles, was kicked off my political boards, and was completely destroyed in
5 my line of work.
6
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8 20. LexisNexis, Choicepoint and Intelius are the only sources that my
9 maiden name could have been obtained from. LexisNexis, Choicepoint and
10 Intelius are the only source my social security number could have been obtained
11 from that appeared on SlaveHack.com. Choicepoint is shown as accessing my
12 credit report through Equifax. Equifax has a wrong birthdate listed for me, which
13 also appears on my LexisNexis file and ChoicePoint file. A woman calling herself
14 Jane used that same wrong birthdate when she contacted me claiming to be my
15 'biological mother' during this time. Oddly enough, Jane is a name used by Taitz
16 on one of her MySpace profiles found in a Spokeo.com search using the email
17 dr_taitz@yahoo.com. Taitz uses many social profiles with various identities.
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22 21. A social profile search using Spokeo.com of Taitz's email
23 news@orlytaitzesq.net shows that she also identifies herself as Anonymous.
24 Anonymous is a hacktivist group (a hacktivist breaks into computer systems, for
25 politically motivated purposes) who also uses SlaveHack.com, where my social
26 security number was published.
27
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1 22. Many of Taitz's 3rd party agents that have assisted with propagation
2 of this case have displayed identifying alliances, logos and characteristics showing
3 they also belong to this hacktivist group, Anonymous. Members of Slavehack.com
4 use the flexibilities provided by the Daylight CIS middleware architecture built
5 into Oracle. Members of Anonymous recently hacked my children's school's
6 database provider.
7

8
9 23. Within the last week, I learned Intelius now sells background
10 information, albeit limited, on my minor children. I can supply your Honor with
11 the Intelius report I purchased from Intelius on my minor child under seal.
12

13 24. On Page 7, lines 10-18 of the MTD, LOOT states:
14

15 "...that the old web site was taken over by the former volunteer web
16 master Ostella and that any donations given to the old web site will
17 not benefit DOFF as Ostella replaced Taitz pay-pal account with her
18 own private account in connection to the pay-pal button on that old
19 web site. Taitz also posted on her web site a report by investigator
20 Sankey, which contained true and correct copy of Liberi's criminal
21 record, that he lawfully obtained from reputable databases gathering
22 records from reputable public sources, such as California Superior
23 court and bankruptcy court."
24

25 Taitz did not just advise of a site change. Taitz did radio interviews on AM,
26 Satellite, TV shows, print interviews, phone calls, 3rd party outreach, and
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1 continuous publications stating I stole monies, hacked and hijacked the site to
2 thwart a movement with political dissidents and incited for retaliation.

3
4 25. On Page 9, lines 1-13, LOOT states in her MTD:

5 "...In ¶68 of the first amended complaint, Plaintiffs adopted Taitz
6 alleged web posting, that "the information she was obtaining came
7 from databases: Lexis Nexis and Choice Point. (FAC ¶68). Plaintiffs
8 followed up that allegation with another allegation that "defendant
9 Orly Taitz already had Liberi and Ostella's private information from
10 the Reed Defendants and Defendants Intellius, Inc(FAC¶70). So,
11 based on Plaintiffs' own allegations in the FAC, under the
12 Communications Decency Act Taitz or her law office LO, as a user of
13 an interactive computer service, cannot be treated as the publisher or
14 speaker of information provided by another information content
15 provider such as Lexis Nexis, Intellius and Choicepoint. What is
16 more, Plaintiffs admit that Neil Sankey first circulated the article,
17 which claimed that Liberi had an extensive criminal record going back
18 to the 90s(FAC ¶63) and that it was Sankey, who provided Taitz with
19 the e-mail address containing Liberi's information(FAC¶69)."
20

21 Taitz requested Sankey to run background checks on Plaintiffs. Sankey did not do
22 these checks on his own initiative. Taitz admits this in the Orange County
23 Sheriff's Department Report she filed against Lisa Liberi and me, see Exhibit "16"
24 filed May 20, 2011, Docket No. 190-4, ;third paragraph on page four. Sankey
25 was needed to run the checks to create a link to pull the information in the database
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1 providers, Lexis/Reed Defendants and Defendant Intelius, for the back end
2 information to be pulled by Yosef Taitz. Yosef Taitz in his professional capacity as
3 CEO through his company, Defendant Daylight CIS, used the embedded access
4 from his software access into the Oracle architecture. Sankey just received the
5 front end reports. But, having Sankey run the reports, created access for Yosef
6 Taitz to obtain the full reports with more information. Sankey is also on record in
7 an interview that when he brought his information to Taitz, she already had the
8 information.

12 26. Then, on Page 15, lines 20-24, LOOT, a Law Office, States:

13 "Moreover, as an attorney and an officer of the court Taitz was
14 obligated to warn her supporters and donors, that her old web site was
15 taken over and the fact that a person with recent serious convictions of
16 grand theft has access to their financial information."

18 Taitz does not warn her supporters and donors of anything. What Taitz has done is
19 created false stories and falsely accuses me of crimes and continues to do this to
20 this day. Taitz told her followers and every person she could find in my personal
21 associations, every customer she could find of GEG and Breederville, every
22 organization I was involved with and filed false reports with NJ Consumer affairs,
23 North Brunswick Police, FBI, Federal and State Politicians and with her County
24 Sheriff, see the Orange County Sheriff's Department Report filed as Exhibit "16",
25 on May 20, 2011, Docket No. 190-4 in the first paragraph on page four where

1 Taitz falsely states I stole \$10,000 from her, I had a criminal record and that Lisa
2 Liberi and I are the same person.

3
4 27. I did add Phil Berg's Law office link to the blog roll of
5 DefendOurFreedoms.Net. That was only a hyperlink to his site. I was not in
6 contact with Berg or his staff prior to the filing of this case. Taitz stated
7
8 *"Moreover, as an attorney and an officer of the court Taitz was obligated to warn*
9 *her supporters and donors, that her old web site was taken over and the fact that a*
10 *person with recent serious convictions of grand theft has access to their financial*
11 *information."* See Taitz filing, page 15, lines 20-24. So I had to preserve my
12 domain names to protect myself from Taitz's false statements and this case had to
13
14 be filed for protection from Taitz criminal actions and false statements.

15
16 28. Further, on Page 17, lines 22-28, LOOT States:

17
18 *"Again, the plaintiff is talking about Taitz posting a report about her*
19 *criminal record and about actions of Ostella locking Taitz out of her*
20 *web site. The Plaintiffs never plead any specific facts, that are not*
21 *true. Plaintiffs did not satisfy the second prong, as they did not plead*
22 *anything highly offensive, that would injure the reputation of the*
23 *Plaintiffs."*

24
25 29. I do not have a criminal record. Yet Taitz reported, published, and
26 enlisted third parties to propagate otherwise. This created ostracisation of the
27 entire Ostella family from friends and neighbors in their former place of residence.
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1 This caused the whole family to have to move and move fast. This created the loss
2 of my entire business. This created humiliation. These accusations, presented as
3 facts, backed by credentials of theft caused the Ostella family's need to move.
4 Caused retaliation on behalf of Taitz followers with the incitement by Taitz that
5 Ostella stole their monies. Publishing a person's contact information and reaching
6 out to everyone they know with a falsified criminal history and accusations of theft
7 of a foundation are highly offensive to anyone and absolutely injured this plaintiff's
8 reputation. As well as this plaintiff's family. This information remains on the
9 internet to this day further lending credibility to Taitz's falsified stories.
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13 30. LOOT Also States at Page 18, lines 21-26:
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15 "Taitz posted information about Liberi and Ostella not to sell a
16 product, but to warn the public about criminal past of Liberi and
17 diversion of funds by Ostella. What was portrayed by Taitz, was not
18 likeness of Liberi and Ostella, but their actions, which were of public
19 concern."
20

21 Lisa Liberi's and Lisa Ostella's names were posted as akas as well as addresses,
22 maiden names, phone numbers, and other personal identifying information as well
23 as family member's to create a flash mob affect among political dissidents. Money
24 was raised and received by Taitz to compensate a martyr status that Taitz created
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1 with false stories, forged documents and create a straw-man for plausible
2 deniability, at Ostella and Liberi's expense.

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4 31. LOOT then states at Page 19, lines 1-4:

5 "In reality, the opposite is true. Liberi used likeness and trade mark of
6 Taitz's not for profit foundation and solicited donations, while Liberi
7 and Berg benefitted from those actions of Ostella, as she locked Taitz
8 out of her old web site and used that web site to promote law office of
9 Berg. This will be addressed in cross complaint against the
10 defendants."
11

12 Lisa Liberi never had access to any of the defendourfreedoms sites. Not even since
13 this suit was filed. Once Taitz's login access was removed in April 2009, I have
14 been the only one logging into that site and no data has been deleted. There are
15 some items I have had to un-publish; but all data remains in that blogsite. I added
16 blog roll links to the sidebar of the DefendOurFreedoms.NET site. The links went
17 to: the Law Offices of Philip J. Berg, Mario Apuzzo, Alan Keyes, Evelyn Adams
18 radio show, Patriot's Heart Broadcasting Network, The Dave Levine Show, and
19 Country First web forum. These were just navigational links. They were not paid
20 advertisements or anything else that depended on the functionality of the
21 DefendOurFreedoms.NET blog site. The owners of those sites did not ask to have
22 them added. The owners of the sites were not promised anything in return. They
23 were just blog roll links. None of these links were any indication that I was
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1 working with anybody. I did not start speaking with Philip J. Berg until I was
2 forced to file this case by Orly Taitz's damaging actions. The only work I
3 performed for Philip J. Berg outside of this court action was a one time favor of
4 getting his websites back up after his site was attacked and taken over in June/July
5 2009, after our suit was filed. I was not his webmaster. His webmaster was at the
6 August 2009 hearing and is a witness in this case.
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9 32. LOOT then states at Page 20-21, lines 8-28 and 1-8:

10 "In the seventh claim plaintiffs allege three causes of action, two of
11 which have no basis for relief under California law: Cyber-
12 Harassment and Cyber-Bullying. See generally cyber-harassment and
13 cyber-bullying. See generally, United States v. Drew, 259 F.R.D. 449
14 (C.D. cal. 2009). the final tort of cyber-stalking is organized to the
15 extend that it merely an allegation of stalking, codified under
16 California civil code §1708.7. In order to establish the tort of stalking
17 Plaintiff must allege the following four elements (1) that LO "engaged
18 in a pattern of conduct the intend of which was to follow, alarm or
19 harass them"; (2) that, as a result of the alleged pattern of conduct,
20 Plaintiff reasonably feared for their safety, or that their safety, or that
21 of an immediate family member; (3) that part of the alleged pattern of
22 conduct was a credible threat with the intention of placing Plaintiffs in
23 reasonable fear for their safety, or that of an immediate family
24 member; and (4) on at least one occasion, the Plaintiff clearly and
25 definitively, but unsuccessfully, demanded that the defendant stop the
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1 pattern of conduct. Cal Civ Code §1708.7. None of the prongs were
2 satisfied or could be satisfied in this case.”

3 “This case revolves around publication made by defendants regarding
4 behavior of the Plaintiffs. The complaint is void of any facts that
5 would show defendants ever following or harassing any of the
6 defendants. The only credible allegation consists of fact that attorney
7 Taitz published information about her website being taken over by
8 webmaster Ostella and about criminal history of Liberi, assistant of
9 Berg. Taitz, also apprised her supporters of the hearing in this case
10 and pleadings submitted. All of the publications represented matter of
11 public concern. Those publications might have made Liberi alarmed
12 that her probation might be revoked. Berg might have been alarmed
13 that he would be found guilty of ethical violations at his disciplinary
14 board trial, as Liberi was his main witness, Ostella might have been
15 alarmed that there might be charges brought against her for diverting
16 funds from DOFF, but there is no credible fact plead by the Plaintiffs
17 to show, that the Plaintiffs were afraid for their lives.”
18

19 In all of Taitz's actions, she presented herself as an Officer of the Court. Taitz, as
20 an officer of the court, presented to courtrooms, international entities, political
21 offices, law enforcement offices, online, offline, in print, on air through feeds,
22 through mail and through the phone, to the extent of thousands of reports that I
23 have or had a felony record, stole from a foundation, hacks, conspires and
24 presented me as an enemy placed to unseat a dissident movement.
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1 33. Taitz even came to New Jersey, drove around my place of residence
2 and my children's school with the sole purpose of making threats to my family.

3
4 34. After this threatening drive by, at least one picture of my minor
5 daughter appeared published on the Internet in a social network site that neither
6 me, nor my daughter ever even knew existed. Yet this same social network site
7 where the picture(s) were published does appear under Taitz's profile with the title
8 of a known hacktivist group, 'Anonymous'.
9

10
11 35. Threats were made known to a 3rd party witness that Taitz targeted
12 my children after this case was filed. Those threats were reported. Due to the
13 threats and outreach of Taitz's lies and actions, we moved for our safety and the
14 safety of our family.
15

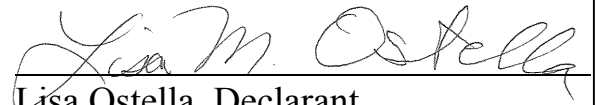
16 36. LOOT then states Page 22, lines 21-24:

17 "Moreover, during December 20, 2010 hearing Liberi and Ostella
18 admitted that Liberi indeed had felony convictions in 2008..."
19

20
21 I never addressed information about Lisa Liberi. It is not my information to speak
22 of. However, I did address the fact that Taitz propagated a record of felony
23 convictions that she applied to me.
24

25 I declare under the penalty of perjury of the Laws of the United States and
26 the State of California that the foregoing is true and correct.
27
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1 Executed this 19th day of September, 2011 in the State of New Jersey.
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5 Lisa Ostella, Declarant
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